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March 30, 2023

VIA ECF

Honorable John G. Koeltl
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Brennan v. Latch, Inc. f/k/a TS Innovation Acquisitions Corp.*
No. 1:22-cv-07473-JGK-GWG

Dear Judge Koeltl:

We represent Lead Plaintiff VB PTC Establishment as Trustee of Gersec Trust (“Gersec Trust” or “Lead Plaintiff”) in this securities class action.

On October 31, 2022, the Court excused Defendant Latch, Inc. (“Latch” or “Company”) from responding to the initial complaint, ordering the parties to confer on and submit a proposed schedule for the filing of an amended complaint and for Latch’s response thereto within fourteen days of the Court’s appointing a lead plaintiff and approving lead counsel (Dkt. No. 27). By Order dated January 17, 2023, after a hearing on the same day (“Hearing”), this Court appointed as Lead Plaintiff the Gersec Trust, approving this firm as Lead Counsel. (Dkt. No. 44).

At the Hearing, the parties informed the Court that Latch had yet to restate its financial statements and that filing an amended complaint before the Company restated would likely necessitate another amendment upon the publication of the restatement. On January 31, 2023, the parties requested that the Court permit them to postpone filing a proposed schedule. (Dkt. No. 46). The Court granted that application, permitting Lead Plaintiff to file an amended complaint within twenty-one (21) days after Latch publishes its restatement and ordering Lead Plaintiff to update it by March 30, 2023, about the status of Latch’s restatement. (Dkt. No. 47).

As of today, Latch has neither published its restatement nor filed any required periodic report with the United States Securities and Exchange Commission since May 5, 2022. Latch's counsel informs that "Latch continues to work on its restatement and does not have a date certain by which it intends to file."

Lead Plaintiff will update the Court again on May 24, 2023.

If the Court has any questions, we stand ready to answer.

Respectfully,

/s/ Jacob A. Goldberg

Jacob A. Goldberg

cc: All counsel of record (via ECF)